

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Alto Maipo Delaware LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 21-11507 (KBO)
)

) (Jointly Administered)
)

) **Objection Deadline: Feb. 8, 2022 at 4:00 p.m. (ET)**
)

**SUMMARY OF SECOND MONTHLY FEE APPLICATION OF YOUNG CONAWAY
STARGATT & TAYLOR, LLP, AS CO-COUNSEL FOR THE DEBTORS, FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM DECEMBER 1, 2021 THROUGH DECEMBER 31, 2021**

Name of Applicant: Young Conaway Stargatt & Taylor, LLP

Authorized to Provide Professional Services to: Debtors and Debtors-in-Possession

Date of Retention: December 17, 2021
(Effective as of November 17, 2021)

Period for which compensation and
reimbursement is sought: December 1, 2021 through December 31, 2021

Amount of Compensation sought as
actual, reasonable and necessary: \$85,100.00

Amount of Expense Reimbursement sought
as actual, reasonable and necessary: \$758.25

This is an: X interim ____ final application

This application does includes 3.60 hours and \$1,997.50 in fees incurred in connection with the preparation of Fee Applications.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number in the jurisdiction in which it operates, are: Alto Maipo SpA (761-2) (Chile) and Alto Maipo Delaware LLC (1916) (Delaware). The location of the corporate headquarters and the service address for Alto Maipo SpA is Los Conquistadores 1730, Piso 10, Santiago, Chile.

Prior applications:

		Requested (\$)		Approved (\$)		
Date Filed / Docket No.	Period Covered	Fees	Expenses	Fees	Expenses	Order Entered
12/20/21 D.I. 185	11/17/21- 11/30/21	\$79,625.50	\$171.06	Pending	Pending	

COMPENSATION BY INDIVIDUAL

Name	Position, Number of Years in that Position, Prior Relevant Experience, Year of Obtaining License to Practice	Hourly Billing Rate	Total Billed Hours	Total Compensation
Pauline K. Morgan	Partner since 2000. Joined firm as an associate in 1997. Member of PA and NJ Bars since 1987. Member of DE Bar since 1997, and NY Bar since 2007.	\$1,075.00	3.30	\$3,547.50
Craig D. Grear	Partner since 2000. Joined firm as an associate in 1996. Member of DE Bar since 1990.	\$1,075.00	0.20	\$215.00
Sean T. Greecher	Partner since 2014. Joined firm as an associate in 2004. Member of DE Bar since 2004.	\$765.00	69.60	\$53,244.00
S. Alexander Faris	Joined firm as an associate in 2020. Member of the DE Bar since 2016.	\$485.00	17.10	\$8,293.50
Heather Smillie	Joined firm as an associate in 2020.	\$400.00	25.50	\$10,200.00
Debbie Laskin	Paralegal	\$320.00	30.00	\$9,600.00
Grand Total:			145.70	\$85,100.00
Blended Rate for All Timekeepers:		\$584.00		

COMPENSATION BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees
Case Administration (docketing, calendar preparation, paperflow) (B001)	23.30	\$10,404.50
Court Hearings (attendance and preparation) (B002)	10.60	\$5,510.00
Cash Collateral/DIP Financing (B003)	8.30	\$5,601.00
Schedules & Statements, U.S. Trustee Reports (B004)	17.20	\$11,871.00
Lease / Executory Contract Issues (B005)	7.90	\$4,387.00
Use, Sale or Lease of Property (B006)	9.20	\$6,274.00
Claims Analysis, Objections & Resolutions (B007)	18.50	\$10,833.50
Meetings (B008)	7.60	\$5,146.00
Stay Relief Matters (B009)	8.50	\$4,526.50
Plan and Disclosure Statement (B012)	6.70	\$4,772.50
General Corporate Matters (B014)	1.10	\$841.50
Employee Matters (B015)	0.60	\$192.00
Retention of Professionals / Fee Issues (B017)	22.60	\$12,743.00
Fee Application Preparation (B018)	3.60	\$1,997.50
TOTALS	145.70	\$85,100.00

EXPENSE SUMMARY

Expenses Category	Total Expenses
Deposition/Transcript	\$483.45
Docket Retrieval/Search	\$11.80
Filing Fee	\$263.00
TOTAL DISBURSEMENTS	\$758.25

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In re:

Alto Maipo Delaware LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 21-11507 (KBO)

(Jointly Administered)

Objection Deadline: February 8, 2022 at 4:00 p.m. (ET)

SECOND MONTHLY FEE APPLICATION OF YOUNG CONAWAY STARGATT & TAYLOR, LLP, AS CO-COUNSEL FOR THE DEBTORS, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM DECEMBER 1, 2021 THROUGH DECEMBER 31, 2021

Pursuant to section 330 and 331 of title 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), and Rule 2016 of the Federal Rules of Bankruptcy Procedure, the law firm of Young Conaway Stargatt & Taylor, LLP (hereinafter “Young Conaway”) hereby moves the Court for reasonable compensation for professional legal services rendered as co-counsel to the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) in the amount of \$85,100.00, together with reimbursement for actual and necessary expenses incurred in the amount of \$758.25, for the period commencing December 1, 2021 through and including December 31, 2021 (the “Fee Period”). In support of its Application, Young Conaway respectfully represents as follows:

1. Young Conaway was employed to represent the Debtors as bankruptcy co-counsel in connection with these chapter 11 cases, pursuant to an order entered by the Court on December 17, 2021 [D.I. 158] (the “Young Conaway Retention Order”). The Young Conaway

1 The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number in the jurisdiction in which it operates, are: Alto Maipo SpA (761-2) (Chile) and Alto Maipo Delaware LLC (1916) (Delaware). The location of the corporate headquarters and the service address for Alto Maipo SpA is Los Conquistadores 1730, Piso 10, Santiago, Chile.

Retention Order authorized Young Conaway to be compensated on an hourly basis and to be reimbursed for actual and necessary expenses.

2. All services for which compensation is requested by Young Conaway were performed for or on behalf of the Debtors.

SUMMARY OF SERVICES RENDERED

3. Attached hereto as **Exhibit A** is a detailed statement of fees incurred during the Fee Period, showing the amount of \$85,100.00 due for fees.

4. The services rendered by Young Conaway during the Fee Period are grouped into the categories set forth in **Exhibit A**. The attorneys and paralegals who rendered services relating to each category are identified, along with the number of hours for each individual and the total compensation sought for each category, in **Exhibit A**.

DISBURSEMENTS

5. Attached hereto as **Exhibit B** is a detailed statement of expenses paid during the Fee Period, showing the amount of \$758.25 for reimbursement of expenses. This disbursement sum is broken down into categories of charges, including, among other things, delivery charges, photocopying charges, teleconference charges, and transcription costs. A complete review by category of the expenses incurred for the Fee Period may be found in **Exhibit B**.

6. Pursuant to Rule 2016-2 of the Local Rules of Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), Young Conaway represents that: (i) its rate for copying charges is \$0.10 per page for black and white copies and \$0.80 per page for color copies; (ii) its rate for outgoing telecopier transmissions is \$0.25 per page (excluding related long distance transmission charges) with no charge for incoming telecopier transmissions; and (iii) there is no surcharge for computerized research.

VALUATION OF SERVICES

7. Attorneys and paraprofessionals of Young Conaway have expended a total of 145.70 hours in connection with this matter during the Fee Period.

8. The amount of time spent by each of these persons providing services to the Debtors for the Fee Period is fully set forth in the detail attached hereto as **Exhibit A**. The hourly rates set forth therein are Young Conaway's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by Young Conaway for the Period as co-counsel for the Debtors is \$85,100.00.

9. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given (i) the complexity of these cases, (ii) the time expended, (iii) the nature and extent of the services rendered, (iv) the value of such services, and (v) the costs of comparable services other than in a case under chapter 11 of the Bankruptcy Code. In addition, Young Conaway has reviewed the requirements of Local Rule 2016-2 and believes that this Application complies with the requirements set forth therein.

WHEREFORE, Young Conaway requests that allowance be made to it in the sum of \$85,100.00 as compensation for necessary professional services rendered to the Debtors for the Fee Period, and the sum of \$758.25 for reimbursement of actual necessary costs and expenses incurred during that period, and further requests such other and further relief as the Court may deem just and proper.

Dated: January 19, 2022

Wilmington, Delaware

/s/ Sean T. Greecher

Pauline K. Morgan (No. 3650)

Sean T. Greecher (No. 4484)

S. Alexander Faris (No. 6278)

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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Counsel to the Debtors and Debtors in Possession

CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 2016-2

I, Sean T. Greecher, hereby certify as follows:

1. I am a partner in the applicant firm, Young Conaway Stargatt & Taylor, LLP ("Young Conaway"), and have been admitted to the bar of the Supreme Court of Delaware since 2004.

2. I have personally performed many of the legal services rendered by Young Conaway, as co-counsel for the Debtors, and am thoroughly familiar with all other work performed on behalf of the Debtors by the lawyers and paraprofessionals in the firm.

3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief. Moreover, I have reviewed the requirements of Rule 2016-2 of the Local Rules of Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and submit that the Application complies with such requirements.

Dated: January 19, 2022

/s/Sean T. Greecher
Sean T. Greecher (No. 4484)